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Attorney for Shumate Tri-City LLC

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In re. . .

SHUMATE TRI-CITY, LLC d/b/a
SHUMATE BUELL, d/b/a **SHUMATE**
HARLEY-DAVIDSON, and f/k/a
SHUMATE HARLEY-DAVIDSON, LLC,

Debtor.

No. **09-05080-FLK11**
Chapter **11**

**DEBTOR-IN-POSSESSION'S
OBJECTION TO GMAC'S MOTION
FOR RELIEF FROM STAY AND
ABANDONMENT**

Shumate Tri-City, LLC, the debtor and debtor-in-possession herein ("Shumate"), objects to GMAC's Motion for Relief from Stay and Abandonment and states the following in support thereof:

1. The property that is subject to GMAC's motion is necessary for an effective reorganization.
2. Shumate will propose that adequate protection payments be made to GMAC subject to the court's approval of a cash collateral order authorizing such payment.

DATED this 4th day of January, 2009.

PAUKERT & TROPPMANN PLLC

/s/ Michael J. Paukert
Michael J Paukert, WSBA No. 20237
Attorney for Shumate Tri-City, LLC